

FILED IN THE  
UNITED STATES  
BANKRUPTCY COURT

2009 OCT 14 PM 12:38

DISTRICT OF UTAH  
MAIL

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**Salt Lake City, Utah 84117**  
**Telephone: (801) 274-9909**

**IN THE UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF UTAH**

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**IN RE:**

**Christopher and Kimberly Hendry,**

**Debtor(s).**

)  
)  
) **MOTION FOR RELIEF FROM**  
) **AUTOMATIC STAY**  
)

) **Bankruptcy No. 09-29124-JAB**  
) **Chapter 7**  
)

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COMES NOW Bank of the West., hereinafter referred to as "Movant" and moves the Court for an Order lifting the Automatic Stay provisions of 11 USC Section 362 with respect to the Debtor's collateral described herein, and in support thereof represents as follows:

1. Debtor(s) are in a chapter 7
2. This Court has jurisdiction of this Motion by virtue of 11 USC Section 105, 361 and 362 and 28 USC Sections 157 and 1334.
3. Movant is the owner and holder of an Installment Sale and Security Agreement, ("Agreement"), executed by Debtors for the purchase of the below described collateral.
4. Movant is secured under the Agreement by a properly perfected first lien security interest in Debtor's 2007 Keystone RV Mountaineer fifth wheel Trailer, VIN#4YDF319217M730544. A true and correct copy of the Certificates of Title showing Movant

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as lien holder is attached hereto as Exhibit "A" and by this reference made a part hereof.

5. The Debtor(s) have defaulted in their payments under the agreement and the total amount due and owing Movant is \$25,319.68 together with after accruing interest, attorney's fees and costs.

6. The Automatic Stay Provision should be lifted for cause pursuant to 11 *USC* Section 362 (d)(1) in that the Movant lacks adequate protection of its interest in the collateral as evidenced by the following:

- a. Debtor has defaulted under the terms of the Purchase Agreement by failing to make the payments when due and owing thereunder.
- b. The collateral is in the state of decline and continues to decline, however Debtor is failing and refusing to make payments thereon.
- c. Debtor is unable to show that the vehicle is properly and fully insured.


7. Movant alleges that the Automatic Stay should also be lifted for cause pursuant to 11 *USC* Section 362 (d)(2) in that the Debtor has no equity in the collateral and it is not necessary for any effective reorganization. The value of the collateral is not more than \$20,995.00 for the collateral, which is less than the total debt owed to Movant as shown on the NADA Value sheet attached hereto as Exhibit B and by this reference made a part hereof.

8. For the above reason, Movant asserts cause exists to waive the requirements of Bankruptcy Rule 4001(a)(3), allowing the stay lift order to be effective upon entry.

**WHEREFORE,** Movant moves the Court for an Order Lifting the Automatic Stay provisions of 11 *USC* Section 362 as to allow the Movant to proceed with repossession proceedings under the agreement, and with all of its rights and remedies pursuant to the law and pursuant to the

agreements between the parties. In the alternative, Movant asks the Court to order adequate protection of the Movant's interest as this Court may deem proper.

DATED this 7<sup>TH</sup> day of October 2009.



L. MARK FERRE  
Attorney for Movant

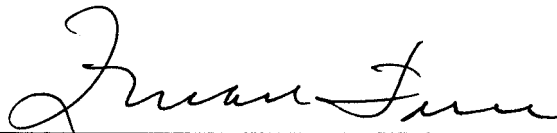
Mailing Certificate

I Certify that on the 13<sup>th</sup> Day of October, 2009, I mailed a copy of the foregoing along with the Notice of Hearing on said motion by first class US Mail, with postage prepaid to the following:

Christopher and Kimberly Hendry  
4669 Wallace Lane  
SLC, Ut 84117

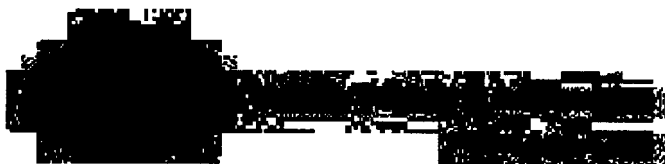
Duane Gillman  
PO Box 4050  
SLC, Ut 84110

Paul Toscano  
10 Exchange Pl. #614  
SLC, Ut 84111



L. Mark Ferre

9/25/2009

**Travel Trailers/Fifth Wheels****2007 KEYSTONE RV MOUNTAINEER FIFTH WHEEL SERIES M-319 BHD**

Weight: 9,980  
Model: M-319 BHD  
Length/Width: 35' x 8'  
Axles: 2  
Self-Contained: YES  
Slides: 2  
Suggested List: \$40,824

Reference Number:

**PRICING**

	<u>Used Wholesale-Trade In</u>	<u>Used Retail</u>
<b>Base Price</b>	\$20,070	\$26,240
<b>Options</b>		
<b>APPLIANCES</b>		
Water Heater 10 Gallon Gas/Elec. w/DSI	\$250	\$325
<b>MISCELLANEOUS OPTIONAL EQUIPMENT</b>		
Ceiling Fan	\$85	\$110
Fuel Station	\$475	\$625
Power Roof Vent	\$115	\$155
<b>TOTAL PRICE</b>	<b>\$20,995</b>	<b>\$27,455</b>

**Notes**

PRICES INCLUDE AIR CONDITIONER, AWNING, STABILIZER JACKS, MICROWAVE, AM/FM CASSETTE STEREO AND WATER HEATER W/DSI. CHALLENGER AND HORNET PREVIOUSLY LISTED UNDER DAMON CORPORATION.

**Next Steps**[Get another price](#)

E &amp; B

## References

## THE PROBLEM



**THE CAST**

THEY ARE THE MAIN CHARACTERS OF THE FILM, AND THEIR NAMES ARE LISTED IN THE FOLLOWING ORDER: JAMES CAAN, FRED ASTAIRE, JANE FONDA, BOB OPEL, AND OTHERS.

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**Abstract**—The purpose of this study was to determine if there were differences in the prevalence of musculoskeletal disorders between two groups of female nurses working in different departments of a hospital. The subjects were divided into two groups based on their work environment: intensive care unit (ICU) and medical-surgical unit (MSU). Data were collected from a questionnaire sent to all subjects. The results showed that the prevalence of musculoskeletal disorders was higher among ICU nurses than MSU nurses. This finding suggests that the work environment may play a role in the development of musculoskeletal disorders.

[REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]



**Figure 1** *Diagram illustrating the experimental design. The subjects were divided into two groups: the control group and the experimental group. The control group received a standard training program, while the experimental group received a modified training program. The subjects were then tested on a series of tasks, and the results were compared between the two groups.*

**1. The following information is provided for the year ended 31 December 2014:**

[illegible][illegible]

1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 26

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